



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ICR/AFM/KCB
F. #2018R01047

*271 Cadman Plaza East
Brooklyn, New York 11201*

December 17, 2020

By Email and ECF

Samuel M. Braverman
Albert Y. Dayan
Kenneth J. Kaplan
Joel M. Stein
Geoffrey R. Kaiser
Todd D. Greenberg
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Re: United States v. Jack Cabasso, et al.
Criminal Docket No. 19-CR-582 (DRH)

Dear Counsel:

The government has made available a further production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. As with the government's prior productions, this material can be obtained by contacting John Palermo at DupeCoop at 973-895-1359. This production supplements the disclosures of Rule 16 discovery produced to individual defendants on January 14, 2020, and November 18, 2020, and to all defendants on June 24, 2020, July 2, 2020, July 10, 2020, July 31, 2020, September 17, 2020, October 16, 2020, and November 24, 2020. The government renews its request for reciprocal discovery from the defendants.

Specifically, enclosed please find the following materials, which are subject to the protective order entered in this case on May 29, 2020:

Records	Bates Number
Anixter Corp.	AVTESI_0003374423-AVTESI_0003374785
Atlantic CommTech Corp.	AVTESI_0003374786-AVTESI_0003383401
CarMax	AVTESI_0003383402-AVTESI_0003383803
Hyatt	AVTESI_0003742954-AVTESI_0003744360
Johnson Controls Federal Systems, Inc.	AVTESI_0003383806-AVTESI_0003383807; AVTESI_0003744361-AVTESI_0003744546
Prager Metis CPAs	AVTESI_0003383808-AVTESI_0003390602
Marnell Gaming, LLC	AVTESI_0003390603-AVTESI_0003390701
Orion Security Solutions	AVTESI_0003390702-AVTESI_0003427668
Security Hunter	AVTESI_0003427669-AVTESI_0003721270
Stotler Yacht and Ship Co.	AVTESI_0003721271-AVTESI_0003721285
STP Nuclear Operating Co.	AVTESI_0003721286-AVTESI_0003721727
Tactical Intelligence	AVTESI_0003721729-AVTESI_0003722146
Tesla	AVTESI_0003722147-AVTESI_0003722232
Torgersen	AVTESI_0003722233-AVTESI_0003722268
Women's Business Enterprise National Council	AVTESI_0003722269-AVTESI_0003723694
Wichita Public Schools	AVTESI_0003723695-AVTESI_0003742953

The data consists of load files containing native, text and TIFF files.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

SETH D. DUCHARME
Acting United States Attorney

By: /s/
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Enclosures

cc: Clerk of the Court (DRH) (by ECF) (without enclosures)